

Message

From: Natalie Nowiski [NNowiski@slb.com]
Sent: 10/27/2020 6:34:35 PM
To: Albright, David [Albright.David@epa.gov]; Ho, Yenhung [Ho.Yenhung@epa.gov]
CC: 'Rebecca Hollis' [rhollis@cleanenergysystems.com]
Subject: Technical Response #2 - Inquiry
Attachments: Mendota Project Risk Register EERP_102720.xlsx

Dear Calvin and David,

Hope you are both doing well. CES is in the process of finalizing the response to the Technical Evaluation Comments and Information Request #2, which will be submitted by October 31, 2020.

In Enclosure #1, EPA recommended that, *“for each scenario, the following be identified: severity of the impact, likelihood of the event; timing of the event; avoidance measures in place to reduce the likelihood of the event; detection methods that reflect planned testing and monitoring; response personnel; and equipment.”* As part of the response, the attached draft of the Project Risk Registrar was prepared to address these issues.

Can you please review and confirm whether the values of the “likelihood” and “severity” are acceptable at this time, or whether EPA would prefer that the values be separated into different categories (ie. Injury/Fatality; amount of damage; impact on project, etc.) for the scenarios that are identified. Please note that the analysis is preliminary given the stage of the project, and will be need to be updated, expanded upon and re-performed as more data becomes available.

Finally, would it be possible to arrange a telephone call next week to discuss questions regarding the risk assessment scenario process in general for Class VI Permitting Applications? We note that there are many different tools that can be utilized to perform these risk assessments, some which utilize a qualitative approach, and others which are quantitative or semi quantitative in nature. We were hoping to obtain further information and guidance as to which methodologies are best suited / preferred by the EPA for Class VI Permitting.

Please let me know if you have any questions or require further clarification.

Best regards,
Natalie

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